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Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

T.C. vs. Uber Technologies, Inc., et al.,
3:25-cv-02109;

A.D. vs. Uber Technologies, Inc., et al.,
3:25-cv-02111;

A.W. vs. Uber Technologies, Inc., et al.,
3:25-cv-02401;

T.B. vs. Uber Technologies, Inc., et al.,
3:25-cv-02678;

A.G.L. vs. Uber Technologies, Inc., et al.,
3:25-cv-02931;

S.D. vs. Uber Technologies, Inc., et al.,
3:25-cv-03547;

T.W. vs. Uber Technologies, Inc., et al.,
3:25-cv-04414;

A.G. vs. Uber Technologies, Inc., et al.,
3:25-cv-04802; and

T.L. vs. Uber Technologies, Inc., et al.,
3:25-cv-04878

**DECLARATION OF DOUGLAS
GRUBBS IN SUPPORT OF PULASKI
KHERKHER, PLLC'S MOTION TO
WITHDRAW AS COUNSEL OF
RECORD (ECF 3750)**

1 I, Donald Douglas Grubbs, declare:

2 1. I am an attorney with the law firm of Pulaski Kherkher, PLLC (hereinafter “PK” or
3 “firm”). I am a member of the State Bar of Texas and am admitted to practice *pro hac vice*
4 before this Court. I make this declaration based on my own personal knowledge. If called upon
5 to testify, I could and would testify competently to the truth of the matters stated herein.
6

7 2. In response to Defendants’ show cause motion (ECF 3604), I re-reviewed the alleged
8 “non-bona-fide receipts” that the above-referenced Plaintiffs previously provided during their
9 case intake process.

10 3. Relying on Defendants’ representations asserted in ECF 3604, its accompanying
11 exhibits and sworn declarations, I personally contacted the above-referenced Plaintiffs via email
12 on July 31, 2025 explaining Uber’s concerns and requesting that Plaintiffs provide my firm with
13 any additional proof of their ride at issue, *e.g.*, the email that Uber typically sends upon ride
14 completion.
15

16 4. On August 1, 2025, I met and conferred with opposing counsel regarding the validity
17 of the above-referenced Plaintiffs’ ride receipts. During the meet and confer zoom, I advised
18 opposing counsel at Shook, Hardy & Bacon and Kirkland & Ellis of my firm’s intention to
19 withdraw should the above-referenced Plaintiffs fail to provide additional ride receipt proof.
20

21 5. My firm followed up with the above-referenced Plaintiffs via telephone and email the
22 week of August 4th. My firm also emailed and mailed correspondence via 2-day Federal
23 Express on August 11, 2025 giving Plaintiffs until August 22, 2025 to provide any additional
24 proof otherwise my firm would initiate the process of withdrawing as their attorneys.

25 6. At the time of filing this declaration, no additional proof supporting the rides at issue
26 has been provided by the above-referenced Plaintiffs nor substitute counsel identified.
27

28 7. My firm has taken reasonable steps to protect the interests and avoid any prejudice to
the above-referenced Plaintiffs by informing them of their options and consequences of failing

1 to respond or provide ample time to produce additional proof of the Uber ride at issue. PK's
2 withdrawal from these cases will not impact the timing or schedule of this litigation.

3 8. I understand that pursuant to Local Rule 11-5(b) that leave to withdraw may be
4 conditioned on my firm continuing to accept papers to forward to Plaintiffs and accept this role
5 should the Court require.
6

7 9. A courtesy copy of this declaration will be served upon the above-referenced Plaintiffs
8 at their last known address and via electronic mail.

9 I declare under penalty of perjury that the foregoing is true and correct, and that this
10 declaration was executed on September 11, 2025 in Houston, Texas.

11 Dated: September 11, 2025

Respectfully submitted,

12 **PULASKI KHERKHER, PLLC**

13
14 /s/ D. Douglas Grubbs

15 D. Douglas Grubbs (TX Bar No. 24065339)

(Admitted Pro Hac Vice)

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19 Counsel for Plaintiffs
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CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2025, I electronically transmitted the foregoing DECLARATION OF D. DOUGLAS GRUBBS IN SUPPORT OF PULASKI KHERKHER, PLLC'S MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: ubermdlservice@listserv.shb.com.

/s/ D. Douglas Grubbs
D. Douglas Grubbs